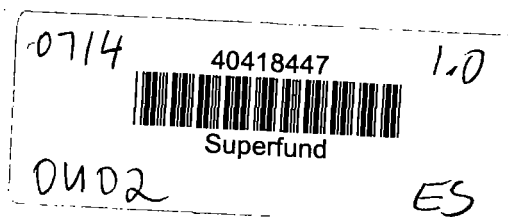


**From:** Skelley, Dana  
**To:** HertzWu, Sara  
**Subject:** document  
**Date:** Friday, April 05, 2013 10:52:18 AM  
**Attachments:** Scanned from a Xerox multifunction device001.pdf

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FYI. Call me if you want to discuss. This is part of the files APCO is producing for the FOIA.

Dana Skelley  
Air Branch Chief, Office of Regional Counsel  
EPA Region 7



**Charles A. Dooley**  
County Executive

**Saint Louis**  
**COUNTY**  
**HEALTH**

**Dolores J. Gunn, MD**  
Director

May 4, 2012

Mr. David Vasbinder  
Environmental Manager  
Bridgeton Landfill, LLC  
13570 St. Charles Rock Rd.  
Bridgeton, MO 63044

Re: Bridgeton Landfill, LLC – Facility ID: 189-0312, Permit Number: OP2010-063  
Response to April 6, 2012 Alternative Timeline Extension Request

Dear Mr. Vasbinder,

Bridgeton Landfill, LLC is subject to 40 CFR Part 60 Subpart WWW and 10 CSR 10-5.490. The provisions of these rules require specific timelines for expansion of the landfill gas collection and control system (GCCS) for exceedances of the landfill gas and wellfield parameters outlined in 40 CFR Part 60 Subpart WWW §60.753. Due to an ongoing subsurface oxidation (SSO) event located in the landfill's south quarry, Bridgeton Landfill, LLC has requested several alternative timeline extension requests to delay expansion of the GCCS required by 40 CFR Part 60 Subpart WWW §60.755(a)(3) and §60.755(a)(5). These alternative timeline extension requests and subsequent approvals are outlined in the Bridgeton Landfill Alternative Timeline Request dated April 6, 2012. The current approval to delay expansion of the GCCS at Bridgeton Landfill is set to expire on June 21, 2012. In a letter dated April 6, 2012, Bridgeton Landfill, LLC has requested an alternative timeline, to correct exceedances, of one year from the date the existing extension expires, or June 21, 2013, for all gas extraction points located and to be located within the south quarry. These existing and proposed extraction points are detailed in the Bridgeton Landfill alternative timeline extension request dated April 6, 2012.

Based upon ongoing evaluations of the wellfield data, gas flow, conditions in the landfill related to the SSO, and the integrity of the gas extraction wells in the vicinity of the SSO, Bridgeton Landfill, LLC believes that expansion of the gas collection system in the south portion of the landfill is not warranted at this time. Bridgeton Landfill, LLC believes that gas collection system expansion may have negative consequences for the SSO event, which continues to exist there. The St. Louis County Air Pollution Control Program approves the April 6, 2012, alternative timeline extension request to delay expansion of the gas collection system within the southern portion of the landfill until June 21, 2013. This approval is made in accordance with 10 CSR 10-5.490(5)(A)(3), 40 CFR 60.755(a)(3) and 40 CFR 60.755(a)(5). The specific extraction points, to which this approval applies, are identified in the Bridgeton Landfill, LLC April 6, 2012, alternative timeline extension request. This approval also applies to all odor collection points which are not yet constructed. Exceedance reports shall continue to be submitted in accordance with Bridgeton Landfill's Missouri State Title V Operating Permit.

**DIVISION OF ENVIRONMENTAL PROTECTION - CENTRAL**

111 South Meramec Avenue • Saint Louis, MO 63105 • PH 314/615-1698 • FAX 314/615-8951  
TTY 314/615-8428 or 800/735-2988 • web <http://www.stlouisco.com>  
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Bridgeton Landfill, LLC

May 4, 2012

Page 2

If you have any additional questions or concerns regarding this matter, please contact Kathrina Donegan at 314.615.8938 or Jeremy Rogus at 314.615.0926.

Sincerely,



Michael Zlatic, P.E.

Environmental Administrator

Environmental Protection Division

MZ:lg

cc: Darcy Bybee, Missouri Department of Natural Resources  
John Haasis, St. Louis County SWMP  
Kathrina Donegan, St. Louis County APCP  
Jeremy Rogus, St. Louis County APCP